IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CREEDON CONTROLS, INC., a Delaware corporation,)
Plaintiff,) C.A. NO. 05-CV-300-JJF
V.)
BANC ONE BUILDING CORPORATION, an Illinois corporation, and FOREST ELECTRIC CORPORATION, a New York corporation, Defendants.)))))
)

NOTICE OF DEPOSITION AND DEMAND FOR PRODUCTION OF DOCUMENTS, AND SUBPOENA OF THE WILMINGTON TRUST COMPANY PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 30(b)(6) AND 45

PLEASE TAKE NOTICE that, pursuant to Rules 30(b)(6), 34(c) and 45 of the Federal Rules of Civil Procedure, Defendant Banc One Building Corporation will take the oral deposition of The Wilmington Trust Company, at the offices of Ashby & Geddes, 222 Delaware Avenue, Wilmington, Delaware 19801, beginning at 9:30 A.M. on June 27, 2006, continuing day to day until complete.

NOTICE IS FURTHER GIVEN THAT the deposition will be recorded stenographically by certified reporter and notary public or such other person authorized to administer oaths under the laws of the United States, and shall continue from day to day until completed. This deposition will be videotaped.

NOTICE IS FURTHER GIVEN THAT pursuant to the Federal Rules of Civil Procedure, Defendant Banc One Building Corporation will serve upon The Wilmington Trust Company a Subpoena in a Civil Case. Attached hereto as Exhibit A is a true and correct copy of that Subpoena. Pursuant to the Subpoena, Defendant Banc One Building Corporation has demanded production of certain documents set forth in Schedule A to the Subpoena.

Dated: June 14, 2006

ASHBY & GEDDES, P.A.

Lawrence C. Ashby (#468)
Philip Trainer, Jr. (#2788)
Ricardo Palacio (#3765)
222 Delaware Avenue
17th Floor
P.O. Box 1150
Wilmington, Delaware 19899
(302)-654-1888

-and-

Of Counsel: PAUL, HASTINGS, JANOFSKY & WALKER, LLP

75 East 55th Street New York, New York 10022 212-318-6000

Attorneys for Defendant Banc One Building Corporation

170349.1